

DMP:CRH/JMH/EHS
F. #2017R00906

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

HU JI,
LI MINJUN,
ZHU FENG,
also known as "Johnny Zhu,"
MICHAEL MCMAHON,
ZHENG CONGYING and
ZHU YONG,
also known as "Jason Zhu,"

I N D I C T M E N T

1:21-cr-00265(FB)(RER)

Cr. No. _____

(T. 18, U.S.C., §§ 371 and 3551 et seq.)

Defendants.

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THE GRAND JURY CHARGES:

COUNT ONE

(Conspiracy to Act as an Agent of a Foreign Government
Without Prior Notification to the Attorney General)

1. In or about and between September 2016 and December 2019, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants HU JI, LI MINJUN, ZHU FENG, also known as "Johnny Zhu," MICHAEL MCMAHON, ZHENG CONGYING and ZHU YONG, also known as "Jason Zhu," together with others, did knowingly and willfully conspire to act in the United States as agents of a foreign government, to wit: the government of the People's Republic of China ("PRC"), without prior notification to the Attorney General of the United States, as required by law, contrary to Title 18, United States Code, Section 951(a).

2. In furtherance of the conspiracy and to effect its objects, within the Eastern District of New York and elsewhere, the defendants HU JI, LI MINJUN, ZHU FENG, also known as "Johnny Zhu," MICHAEL MCMAHON, ZHENG CONGYING and ZHU YONG, also known as "Jason Zhu," together with others, did commit and cause the commission of, among others, the following:

OVERT ACTS

- (a) On or about and between September 26, 2016 and October 5, 2016, ZHU YONG retained MCMAHON to investigate and locate John Doe #1 and Jane Doe #1, individuals whose identities are known to the Grand Jury.
- (b) On or about October 20, 2016, HU JI traveled to the United States from the PRC.
- (c) On or about October 27, 2016, HU JI, MCMAHON and ZHU YONG met at a restaurant in Paramus, New Jersey.
- (d) On or about and between November 12, 2016 and March 27, 2017, HU JI and MCMAHON communicated by email regarding the plan to render John Doe #1 and Jane Doe #1 to the PRC.
- (e) On or about April 1, 2017, ZHU FENG communicated with a PRC official about making false statements to U.S. border enforcement officials to secure the entry of John Doe #1's father into the United States.
- (f) On or about April 5, 2017, LI MINJUN traveled to the United States from the PRC with John Doe #1's father.

(g) On or about April 5, 2017 and April 6, 2017, MCMAHON performed surveillance of John Doe #1, Jane Doe #1 and their family, at the direction of PRC officials.

(h) On or about September 4, 2018, ZHENG CONGYING and a co-conspirator traveled to John Doe #1's residence in New Jersey and left a handwritten note demanding that John Doe #1 return to the PRC.

(Title 18, United States Code, Sections 371 and 3551 et seq.)

COUNT TWO
(Conspiracy to Engage in Interstate Stalking)

3. In or about and between September 2016 and December 2019, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants HU JI, LI MINJUN, ZHU FENG, also known as "Johnny Zhu," MICHAEL MCMAHON, ZHENG CONGYING and ZHU YONG, also known as "Jason Zhu," together with others, did knowingly and willfully conspire to travel in interstate and foreign commerce, with the intent to harass and intimidate, and place under surveillance with the intent to harass and intimidate, one or more persons, to wit: John Doe #1, Jane Doe #1 and Jane Doe #2, an individual whose identity is known to the Grand Jury, and in the course of, and as a result of, such travel, to engage in conduct that would cause, would attempt to cause and would be reasonably expected to cause John Doe #1, Jane Doe #1 and Jane Doe #2 substantial emotional distress, contrary to Title 18, United States Code, Section 2261A(1)(B).

4. In furtherance of the conspiracy and to effect its objects, within the Eastern District of New York and elsewhere, the defendants HU JI, LI MINJUN, ZHU FENG, also known as "Johnny Zhu," MICHAEL MCMAHON, ZHENG CONGYING and ZHU

YONG, also known as "Jason Zhu," together with others, did commit and cause the commission of, among others, the following:

OVERT ACTS

- (a) On or about and between September 26, 2016 and October 5, 2016, ZHU YONG retained MCMAHON to investigate and locate John Doe #1 and Jane Doe #1.
- (b) On or about and between November 12, 2016 and March 27, 2017, HU JI and MCMAHON communicated by email regarding the plan to render John Doe #1 and Jane Doe #1 to the PRC.
- (c) On or about April 5, 2017, LI MINJUN, ZHU FENG and others brought John Doe #1's father to a residence in New Jersey belonging to a relative of John Doe #1 and directed John Doe #1's father to attempt to compel John Doe #1 to travel to the PRC against his will.
- (d) On or about April 11, 2017, MCMAHON proposed to ZHU FENG to harass John Doe #1 by parking outside of John Doe #1's residence and "let[ting] him know we are there."
- (e) Between approximately April 2018 and July 2018, a co-conspirator sent unsolicited and derogatory messages about Jane Doe #2 and Jane Doe #2's family members to associates of Jane Doe #2.

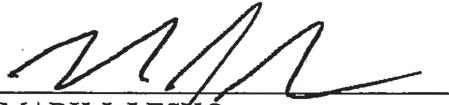
(f) On or about September 4, 2018, ZHENG CONGYING and a co-conspirator traveled to John Doe #1's residence in New Jersey and left a handwritten note demanding that John Doe #1 return to the PRC.

(Title 18, United States Code, Sections 371 and 3551 et seq.)

A TRUE BILL



FOREPERSON



MARK J. LESKO
ACTING UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F. #2017R00906
FORM DBD-34
JUN. 85

No. .

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

*HU JI, LI MINJUN, ZHU FENG, also known as "Johnny Zhu,"
MICHAEL MCMAHON, ZHENG CONGYING and ZHU YONG, also
known as "Jason Zhu,"*

Defendants.

INDICTMENT

(T. 18, U.S.C., §§ 371 and 3551 et seq.)

A true bill

Foreperson

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

*Craig R. Heeren, J. Matthew Haggans, Ellen H. Sise,
Assistant U.S. Attorneys (718) 254-7000*